

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No. 20-10322

Chapter 11

**ORDER AUTHORIZING THE DIOCESE TO RETAIN ALDRICH & COX,
A SUBSIDIARY OF CRAIN, LANGNER & CO. AS AN INSURANCE
AND RISK MANAGEMENT CONSULTANT PURSUANT TO SECTIONS
105(a) AND 363(b) OF THE BANKRUPTCY CODE**

Upon Motion (the “Motion”)¹ of The Diocese of Buffalo, N.Y. (the “Diocese”) for entry of an order (this “Order”) authorizing the Diocese to employ and retain Aldrich & Cox, a subsidiary of Crain, Langner & Co. (“A&C”), as an insurance and risk management consultant pursuant to sections 105(a) and 363(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”); the Court having reviewed the Motion; the Court finding that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and (c) employment of A&C is necessary and in the best interests of the Diocese’s estate, creditors, and other parties in interest; the Court finding that notice of the Motion given by the Diocese was sufficient under the circumstances; and having determined that the legal and factual bases set forth in the Motion establish just cause for the relief herein granted, and after due deliberation and cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.

¹ Each capitalized term used, but not otherwise defined herein, shall have the meaning ascribed to such term in the Motion.

2. All objections to the Motion or the relief requested therein that have not been made, withdrawn, waived, or settled, and all reservations of rights included therein, are overruled on the merits.

3. The Diocese is authorized, pursuant to sections 105 and 363(b) of the Bankruptcy Code, to retain A&C as an insurance and risk management consultant, on the terms set forth in the A&C Proposal, in the above-captioned Chapter 11 Case, effective immediately.

4. To the extent there is inconsistency between the terms of the A&C Proposal, the Motion, and this Order, the terms of this Order shall govern.

5. Notwithstanding the possible applicability of Rules 6004, 7062 and 9014 of the Bankruptcy Rules, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

6. The Court shall retain jurisdiction over any matter or dispute arising from or relating to the implementation of this Order.

Dated: _____, 2024
Buffalo, New York

Hon. Carl L. Bucki
United States Bankruptcy Judge